



Fw: Revised WIP Sections Dealing with CSS Discharges

Katherine Antos to: Lucinda Power

12/12/2010 10:42 AM

FYI

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----- Forwarded by Katherine Antos/CBP/USEPA/US on 12/12/2010 10:41 AM -----

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Date: 12/11/2010 09:43 PM
Subject: Re: Revised WIP Sections Dealing with CSS Discharges

Al - Thanks for working with EPA to come to a mutually agreeable approach. The revisions you have made to the CSO/CSS sections of the WIP will work for the near-term. As your revised WIP language states, "Appropriate action is needed to incorporate these changes in Phase II," additional discussion will be needed in 2011 prior to completion of the Phase II WIP to ensure that DEQ and EPA can come to agreement by 12/2011 on the language of the Watershed General Permit dealing with CSOs. If we cannot reach agreement, then it is likely that WLA would have to be reopened during Phase II to ensure that the WLAs are reasonable and compliance is adequately addressed. However, I am confident that we can come to an agreeable approach prior to the end of next year.

Thanks for your help.

jc

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"Pollock, Alan (DEQ)" Jeff, Attached are redrafts of Sections 3 and... 12/07/2010 11:07:05 AM

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Date: 12/07/2010 11:07 AM
Subject: Revised WIP Sections Dealing with CSS Discharges

Jeff,

Attached are redrafts of Sections 3 and 4 of the November 29 VA-WIP to address CSS loads issues and to respond to the approach that we have recently discussed with EPA. What we tried to do with the redraft is the following:

1. Simplify and clarify the sections dealing with the CSS loads.
2. Describe how the proposed WLAs for the CSS communities were derived.
3. Regarding implementation, simply acknowledge that the WLAs will be implemented through the VPDES permit program.

I believe this is responsive to the approach we have recently suggested. Our expectation is that in response to these WIP revisions, EPA is willing to state that the final TMDL will not contain language that would conflict with this suggested implementation approach, i.e., that the parties will work out implementation through the VPDES permit program.

Please let me know if you have any questions, or would like to discuss this issue further.
Thanks,
alan

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12-7-10_ Revised CSS SECTIONS 3 and 4 from Nov 29 WIP.doc